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ATTORNEYS FOR PLAINTIFFS

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

**CARLIE SHERMAN, ANNA GOZUN,**  
and **AMANDA NASH**, on behalf of themselves and  
all similarly situated persons,

PLAINTIFFS,

v.

**TRINITY TEEN SOLUTIONS, INC.**, a Wyoming  
corporation **ANGELA C. WOODWARD; JERRY D.**  
**WOODWARD; KARA WOODWARD; KYLE**  
**WOODWARD**; and **DALLY-UP, LLC**, a  
Wyoming limited liability corporation;

DEFENDANTS.

**Case No. 2:20-CV-215-SWS**

**NOTICE TO TAKE THE DEPOSITION OF KARA WOODWARD**

**TO: Kara Woodward  
c/o Lillian L. Alves  
Thomas Quinn  
Lindsey M. Romano  
555 Seventeenth Street  
Suite 3400  
Denver, CO 80202**

PLEASE TAKE NOTICE, that Plaintiffs, Carlie Sherman, Anna Gozun, and Amanda Nash, pursuant to Rule 30 of the Federal Rules of Civil Procedure, hereby files this notice of Deposition of Defendant, Kara Woodward, via teleconference<sup>1</sup>, commencing on **Wednesday, June 15, 2022, beginning at 10:00 a.m. CST**, Central Standard Time, and continuing thereafter from hour to hour and day to day until complete.

The deposition will be taken on behalf of Plaintiffs for the purpose of discovery, use as evidence, preservation of testimony, and all other purposes authorized by law and will be recorded by a certified court reporter, through Zoom, who will record the deposition by means of stenograph and/or audio recordings. The deposition may also be recorded by video or other visual and electronic means. A representative from the court reporting agency will contact all attorneys that are parties to this action to provide the Zoom invite prior to the date of the deposition.

/s/Craig A. Edgington  
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<sup>1</sup> “Teleconference” is defined to mean any means of taking the deposition that utilizes telecommunications technology including, but not limited to, telephone, videoconference, Voice Over Internet Protocol audio. The specific details of the method shall be provided either by the attorney noticing this deposition or by the entity providing the teleconference service. The method of taking the deposition shall govern the manner in which exhibits shall be presented to the deponent, but the deponent should be prepared to have access to a computer with a high-speed internet connection, video capability, Adobe Flash, and a Google Chrome browser. As of the date of this Notice, the attorney giving notice of the deposition intends to utilize Zoom as the specific mechanism to take the deposition. In the event that this is not feasible for the deponent, deponent should contact the attorney giving notice of this deposition as soon as practicable to make alternative arrangements.

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ATTORNEYS FOR PLAINTIFFS AND  
PUTATIVE CLASS MEMBERS

**CERTIFICATE OF SERVICE**

This certifies that a true and correct copy of the above and foregoing document has been served with the Court's ECF filing system, and via e-transmission to all parties this the 16<sup>th</sup> day of May 2022.

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